

EXHIBIT A

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Donna Curling, et al.,

Plaintiffs,

CIVIL ACTION FILE

vs.

NO. 1:17-cv-02989-AT

Brad Raffensberger, et
al.,

Defendants.

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VIDEO 30(b)(6) DEPOSITION OF  
SECRETARY OF STATE  
THROUGH  
ROBERT GABRIEL STERLING

October 12, 2022  
9:26 a.m.

Suite 3250, One Atlantic Center  
1201 W. Peachtree Street  
Atlanta, Georgia

S. Julie Friedman, CCR-B-1476

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1       got to go back and do it again.

2                 This is a problem. I mean, then their  
3       lines are back around. Somebody jumps back ahead.  
4       There's other things we have to look at and take into  
5       account when doing all these policies.

6                 But the legislature passed a policy. The  
7       executive branch, under Secretary Raffensperger,  
8       executed that policy. We executed it going through a  
9       DOAS bid process; and then we worked with the SEB to  
10      put rules and processes around it, following best  
11      practices we learned from other states and from the  
12      vendor, in talking to counties.

13                And those rules and what we do around them  
14      are always changing and -- and working to improve to  
15      make them better; and working with the vendor, we've  
16      moved on to the next 5.17, which eliminates many of  
17      the things that Dr. Halderman talked about in his  
18      report.

19                We are moving on to doing a pilot of new  
20      Poll Pads to allow for -- for quicker transparency  
21      and easier loading of issue. It's always an evolving  
22      system.

23                You can't just look at that as the one  
24      thing. It is a plethora of items that we have to  
25      take into account, while following the law at the

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1 C E R T I F I C A T E  
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4 STATE OF GEORGIA:

5 COUNTY OF FULTON:

6

7 I hereby certify the foregoing transcript  
8 was taken down, as stated in the caption, and  
9 the questions and answers thereto were reduced  
10 to typewriting under my direction; that the  
11 foregoing pages 1 through 434 represent a true,  
12 complete, and correct transcript of the evidence  
13 given upon said hearing, and I further certify  
14 that I am not of kin or counsel to the parties  
15 in the case; am not in the regular employ of  
16 counsel for any of said parties; nor am I in  
17 anywise interested in the result of said case.

18

This, the 17th day of October, 2022.

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S. JULIE FRIEDMAN, CCR-B-1476

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